

UNITED STATES DISTRICT COURT

for the

Middle District of TN
Nashville Division

FILED

2025 MAR -3 AM 11:52

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Masheka Lindsey, Serry Ridley
Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Waverly Police Chief Gillespie, Detective Michael Hubbs Sgt Amanda Serman
Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

3:25-cv-0247 (KC)

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☐ Yes

☒ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

Masheka Lindsey 621 Tiny Town Rd.
 Jerry Ridley 621 Tiny Town Rd. 1103
 Clarksville TN. 37042
 City State Zip Code
 Montgomery Co.
 615 919-2019
 Masheka.lindsey@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Grant Gillespie
 Chief Waverly Police
 103 E Main St.
 Waverly TN. 37185
 City State Zip Code
 Humphrey's Co.
 931 296-4300
 Grantgillespie@gmail.com
☐ Individual capacity ☒ Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Michael Hubbs
 Detective Waverly Police
 103 E Main St. 109 Whippoorwill Dr.
 Waverly TN. 37185
 City State Zip Code
 Humphrey's Co.
 931 296-4300
☐ Individual capacity ☒ Official capacity

Defendant No. 3

Name

Amanda Serman

Job or Title (if known)

Sgt.

Address

Waverly

City

TN.

State

37185

Zip Code

County

Humphrey's Co.

Telephone Number

931-296-4300

E-Mail Address (if known)

☐

Individual capacity

☒

Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☐

Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Civil Rights Violations 1983

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Civil Rights

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
-

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Waverly TN. 37185

- B. What date and approximate time did the events giving rise to your claim(s) occur?

April 24, 2024 app. 11:36 a.m.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See Attachment

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

SEE ATTACHMENT

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I want justice

I want 56 Millions dolls. Neg.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/3/2025

Signature of Plaintiff

Printed Name of Plaintiff

Masheka Lindsey Jerry Ridley
Masheka Lindsey Jerry Ridley

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

D. Sergeant Amanda German called for backup on 4/24/2024 Detective Michael Hubbs reported to the traffic stop, both Sergeant Amanda German and Detective Michael Hubbs were acting unlawful using derogatory language etc. They provoked, engaged and encouraged each other throughout the traffic stop and engaged in unlawful behavior and racial profiling towards Jerry Ridley and I.

C. I emailed Chief Grant Gillespie at the Waverly Police department asking for Sergeant Amanda German's body cam. After viewing some concerning live photos and videos taken by Jerry Ridley, we received the footage from her body cam on 6/28/24 After further investigation of the body cam, Sergeant Amanda German's body cam, vehicle cam, and backseat cam is tampered with.

In the videos Jerry Ridley filmed Sergeant Amanda German was blocking the driver side rear view mirror with her body while quickly looking up at Detective Michael Hubbs while he was standing in front of Sergeant Amanda German vehicle and behind our vehicle aiming a deadly weapon in the back of both our heads unprovoked. He was seen in the video running back to the passenger side of her vehicle out of my rear-view mirror.

Involvement;

Masheka Lindsey, Jerry Ridley, Sergeant Amanda German and Detective Michael Hubbs are the only ones involved and saw these events occur.

Injuries for Masheka Lindsey & Jerry Ridley;

Emotional Distress, Nausea and Vomiting, PTSD

Relief; Jerry Ridley compensation \$150,000, Amount of court cost, Emotional Support,

Complaint for Civil Rights Violation

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**Masheka Lindsey and Jerry Ridley, -
Plaintiffs,**

v.

**Waverly Police Department, Officer Amanda Jerman, and Unknown Officer(s),
Defendants.**

Case No.

COMPLAINT

Plaintiffs:

**Masheka Lindsey
621 Tiny Town Rd Clarkville, TN 37042**

**Jerry Ridley
621 Tiny Town Rd apt Clarkville, TN 37042**

Defendants:

**Waverly Police Department
103 Main St. Waverly TN 37185**

**Officer Amanda Jerman
Badge Number 4314
Waverly Police Department**

Micheal Hubbs

**White, Male, mid 50's black hair, black eyeglasses approx 5'9 aprox. 185 lbs to 190 lbs
slim built**

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 because this action arises under the Constitution and laws of the United States, including 42 U.S.C. § 1983.
2. Venue is proper in this district pursuant to 28 U.S.C. § 1391 because the events giving

rise to this claim occurred in this district.

II. PARTIES

3. **Plaintiff Masheka Lindsey** is an individual residing in Humphreys County, Tennessee.
4. **Plaintiff Jerry Ridley** is an individual residing in Humphreys County, Tennessee.
5. **Defendant Waverly Police Department** is a municipal agency of the City of Waverly, Tennessee.
6. **Defendant Officer Amanda [Last Name]** is an officer employed by the Waverly Police Department, acting in her official capacity.
7. **Defendant Unknown Officer(s)** are unidentified officers who were present at the scene and whose actions are described herein.

III. FACTUAL ALLEGATIONS

8. On April 24, 2024, at approximately 11:00 AM, Plaintiff Masheka Lindsey was traveling on East Main Street in Waverly, Tennessee, approaching a red light at the intersection with North Church Street.
9. Plaintiff Lindsey made a complete stop at the red light and noticed a police vehicle in the opposite lane.
10. Upon the light turning green, Plaintiff Lindsey made a left turn onto North Church Street. The police vehicle followed, despite there being no apparent cause for the stop.
11. Plaintiff Lindsey made a quick left turn onto Richland Avenue and parked in front of Cannons Body Shop. The police vehicle passed and then positioned itself in a parking lot, facing Plaintiff Lindsey's vehicle.
12. At 11:27 AM, Plaintiff Jerry Ridley exited the vehicle and entered Cannons Body Shop. At this time, Plaintiffs documented the police vehicle's presence, showing that it remained stationary and monitored their activities.
13. At 11:36 AM, as Plaintiffs returned to the vehicle and Plaintiff Lindsey drove, the police vehicle followed, eventually initiating a traffic stop.
14. Officer Amanda [Last Name] approached Plaintiff Lindsey's vehicle and inquired about expired tags. Despite providing registration, Plaintiff Lindsey acknowledged not having insurance.
15. While Officer Amanda was handling Plaintiff Lindsey's documents, Plaintiffs observed an unidentified male in a white Ford F-150 pickup truck approaching the police vehicle.
16. At 11:44 AM, Plaintiff Ridley captured a live image showing Officer Micheal Hubbs a white male pointing a gun towards the back of the Plaintiffs' vehicle from the front of Officer Amanda's patrol vehicle, raising concerns of police misconduct.
17. Officer Amanda returned with a citation. Plaintiffs accepted it and subsequently drove to the police precinct to file a complaint.
18. Chief Gillespie at the precinct only provided a verbal response to Plaintiffs' concerns and did not document their complaint in writing.

IV. CLAIMS

Count I: Violation of Civil Rights Under 42 U.S.C. § 1983

19. Plaintiffs incorporate by reference all preceding paragraphs.
20. The actions of Defendants, including unjustified surveillance, excessive and potentially threatening behavior, and failure to address complaints, constitute violations of Plaintiffs' rights under the Fourth and Fourteenth Amendments to the U.S. Constitution.

Count II: Violation of Tennessee State Laws

21. Plaintiffs incorporate by reference all preceding paragraphs.
22. Defendants' actions may constitute violations of Tennessee state laws, including Tenn. Code Ann. § 8-8-302 (Duty of Law Enforcement Officers) and Tenn. Code Ann. § 39-16-602 (Official Misconduct).

Count III: Police Misconduct

23. Plaintiffs incorporate by reference all preceding paragraphs.
24. The observed conduct of Defendants, including surveillance and the presence of an unidentified male pointing a weapon, raises concerns of misconduct and abuse of authority.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

1. Award compensatory damages in an amount 56 million to be determined at trial;
2. Award punitive damages to deter future misconduct;
3. Grant injunctive relief to address and rectify the ongoing issues of police misconduct;
4. Award Plaintiffs their reasonable attorney's fees and costs of this action; and 5. Grant any other relief deemed just and proper.

Dated: 9/16/2024

Respectfully submitted,

Masheka Lindsey
621 Tiny Town Rd Clarkville, TN 37042
929-301-8657

mashekalindsey@gmail.com

Signature:

Masheka Lindsey 3/3/2025
Jerry Ridley 3/3/2025

Masheka Lindsey

Jerry Ridley

OATH

I, Masheka Lindsey, declare under oath that the information contained in this Complaint is true and accurate to the best of my knowledge and belief. I understand that providing false information may result in legal consequences.

Signature: *Masheka Lindsey* *Jerry Ridley*

Masheka Lindsey

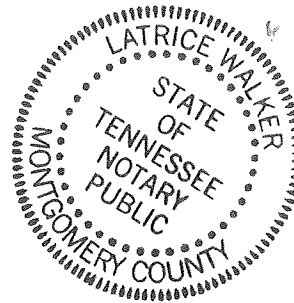
Date: 09.02.2024

Sworn to and subscribed before me this 20 day of September, 2024.

Latrice Walker

Notary Public

My commission expires: 07.15.2028



OATH

I, Jerry Ridley, declare under oath that the information contained in this Complaint is true and accurate to the best of my knowledge and belief. I understand that providing false information may result in legal consequences.

Signature: *Masheka Lindsey*

Jerry Ridley

Date:

Sworn to and subscribed before me this 3/3/2025 day of _____, 2024.